Message

From: Conetta, Benny [Conetta.Benny@epa.gov]
Sent: 2/24/2020 4:35:13 PM
To: Munoz, Hiralda [Munoz.Hiralda@epa.gov]; Haklar, James [Haklar.James@epa.gov]; Stein, Carol [Stein.Carol@epa.gov]
Subject: FW: US EPA Review for TSCA Compliance
Attachments: N62470.16.D.9004.F6147 Remedial Action Work Plan Final RLSO.pdf; N62470.16.D.9004.F6147 WMP Final RLSO.pdf

Flag: Follow up

Hi all,

This was the most recent dealings with pcbs. I don't think this is part of the FOIA request as this is discussing site 1 not OU3, but Carol would be best to answer that question.

If this is not part of the FOIA, the only other thing would be if we had a pcb clean-up for the OU3 area in the past.

ben

From: Murray, Brian S CIV USN NAVFAC MIDLANT NOR (USA) <brian.s.murray@navy.mil>
Sent: Thursday, April 25, 2019 11:52 AM
To: Conetta, Benny <Conetta.Benny@epa.gov>
Cc: Azzam, Nidal <Azzam.Nidal@epa.gov>; Bill Deane (APTIM Fed Services) <William.deane@cbifederalservices.com>; Monica Smeal (APTIM Fed. Services) <monica.smeal@aptim.com>; Donald Hesler <donald.hesler@dec.ny.gov>; Jason Pelton <jason.pelton@dec.ny.gov>
Subject: US EPA Review for TSCA Compliance

Ben,

Per our phone conversation, I have captured your questions related to the Navy's removal and disposal of soils at Site 1, NWIRP Bethpage, NY in accordance with TSCA requirements.

To facilitate your review of TSCA compliance, I have provided answers to your questions.

1. What are the levels of PCBs?
   Under current conditions, the maximum concentration of PCBs in the surface soil is 88 mg/kg. The maximum detection of PCBs in unsaturated subsurface soils (2 to 50 feet bgs) is 3,500 mg/kg at 8 to 10 feet bgs.

2. What are we going to do with soils?
   Contaminated soils will be excavated to targeted depths, staged onsite, characterized via sampling for off-site disposal, and then transported to approved facilities. Specifics for this topic are provided in the Waste Management Plan.

3. What is the source of the PCBs? Are they from pre-1978 releases?
   From the early 1950's to 1978, drums containing liquid wastes were stored on a cinder-covered area over a cesspool leach field. This leach field may have been used to discharge process wastewater. Transformers and PCB-filled autoclaves were also stored at the site. The waste drums reportedly contained chlorinated and non-chlorinated solvents, and liquid cadmium and chromium wastes. In addition, underlying most of Site 1 are approximately 120 abandoned cesspools that were designed to discharge sanitary wastewaters from Plant No. 3 that were in use from the early 1950s to 1978. There are no known reports of leaks or spills of drum contents at Site 1.
   Dry Well 20-08 was part of a storm water management system. The dry wells functioned to infiltrate low volumes of water and overflowed higher volumes of water into

the recharge basins. PCB-containing fluids are suspected to have been introduced by Northrop Grumman operations to the system through floor drains, and subsequently to underlying soil, through permeable well bottoms.

4. What is our design for sampling of excavated soils?
   Waste characterization sampling and analysis will be conducted on all excavated soil at a frequency of one sample per 500-CY. The samples will be collected as composite and discrete grab samples from the stockpiles of excavated soil located in the material storage areas. Composite waste characterization samples will be analyzed for PCBs, ignitability, corrosiveness, reactivity, Toxicity Characteristic Leaching Procedure (TCLP) metals, target compound list (TCL) SVOCs, pesticides, and herbicides and discrete waste characterization samples will be analyzed for VOCs to characterize the material for disposal. Additional sampling and comparison values may be required based upon the proposed approved facility requirements. Specifics for this topic are provided in the Waste Management Plan, Section 4.2.

5. What is the amount of waste (both non-TSCA and TSCA)?
   31,947 tons of soil are anticipated to be disposed of as non-hazardous
   15,521 tons of soil are anticipated to be disposed of as hazardous due to PCB concentration greater than 50 parts per million
   2,512 tons of soil are anticipated to be disposed of as hazardous (RCRA/TSCA) due to elevated Cd, Cr, or PCBs
   Discussion of the waste distribution is provided in the Remedial Action Work Plan.

6. Where is the waste going to be sent?
   The proposed facilities for transportation and disposal of RCRA-Hazardous, TSCA- Hazardous, and non-hazardous soils are provided below:
   Non-Hazardous Soil
   Gloucester County Solid Waste Complex
   109 Budd Boulevard
   Woodbury, NJ 08096
   Phone: (856) 379-7391
   EPAID#: LOP100003

   RCRA Hazardous Soil
   US Ecology Idaho
   20400 Lemley Road,
   Grand View, ID 83624
   Phone: (800) 274-1516
   EPAID#: IDD073114654

   Envirosafe Services of Ohio
   876 Otter Creek Roadd
   Oregon, OH 43616
   Phone: (215) 659-2001
   EPAID#: OHD045243706

   TSCA Hazardous Soil (PCB > 50 parts per million [ppm])
   Heritage Subtitle C Landfill
   4370 West Country Road 1275 North
   Roachdale, IN 46172
   EPAID#: IND980503890

   US Ecology Michigan Landfill
   49350 North I-94 Service Drive,
   Belleville, MI 48111

Phone: (800) 592-5489
EPAID#: MIS048090633

Alabama Department of Environmental Management
PO Box 55
Emelle, AL 35459
Phone: (404) 402-5732
EPAID#: ALD000622464
TSCA Hazardous Soil (PCB > 1,000 ppm)
CWM Waste Management Emelle

7. Provide details on equipment decontamination procedures.
   Equipment necessary for decontamination activities will be provided, installed, and verified in working order prior to site operations. Equipment in the decontamination area includes items such as brushes and waste containers, power washers, and/or equipment suitable for dry decontamination procedures.
   The decontamination area will be used to remove site materials such as dirt and mud from vehicles prior to accessing a public roadway. Equipment contacting known or suspected contaminant-impacted material shall be decontaminated at the work area prior to relocation to the support zone.
   Decontamination water will be pumped from the decontamination pad using a six-in. diesel pump with a 25-ft. hose through a 10-oz. filter bag to be stored in a 20,000-gallon portable storage tank. Prior to off-site disposal, stored decontamination water will be sampled for waste characterization analysis.
   Specifics for this topic are provided in the Waste Management Plan, Section 4.3.

We have begun our excavation of the 0 to 2 ft soils. I have attached the Remedial Action Work Plan and Waste Management Plan. These files are in red-line strikeout to reflect changes requested by NYSDEC and the Navy. Can you provide a date for completion of your review of the TSCA sections?

Thanks.

Brian Murray PG, PMP
Restoration Project Manager
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